

EXHIBIT 7

Attorneys for Defendant
ABBOTT LABORATORIES

IN RE ABBOTT LABORATORIES NORVIR
ANTITRUST LITIGATION

**ABBOTT LABORATORIES'
RESPONSES TO PLAINTIFFS' SECOND
REQUEST FOR PRODUCTION OF
DOCUMENTS**

Honorable Claudia Wilken

DOCUMENT REQUEST NO. 43

All documents evidencing, referring, or relating to the number, proportion, or market share of patients who use Ritonavir as a stand-alone protease inhibitor as compared to those who use Ritonavir Co-administered with other Protease Inhibitors.

RESPONSE: Abbott incorporates its General Objections as if fully set forth herein. Further answering, Abbott specifically objects to this request because it is over broad, vague unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing, Abbott will produce, to the extent they exist, documents containing information regarding the number or percentage of patients who use ritonavir as a stand-alone protease inhibitor as opposed to as a booster.

DOCUMENT REQUEST NO. 44

All documents evidencing, referring, or relating to Abbott's decision to market Ritonavir in 100 mg. (sic) doses.

RESPONSE: Abbott incorporates its General Objections as if fully set forth herein. Further answering, Abbott specifically objects to this request because it irrelevant, over broad, vague, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Relevant documents relating to the marketing of Norvir already have been produced.

DOCUMENT REQUEST NO. 45

All documents evidencing, referring, or relating to Abbott's decision not to market Ritonavir in doses larger than 100 mg.

RESPONSE: Abbott incorporates its General Objections as if fully set forth herein. Further answering, Abbott specifically objects to this request because it irrelevant, over broad, vague, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Relevant documents relating to the marketing of Norvir already have been produced.

DOCUMENT REQUEST NO. 46

All documents evidencing, referring, or relating to the marketing or promotion of Ritonavir as a drug that Boosts other Protease Inhibitors.

RESPONSE: Abbott incorporates its General Objections as if fully set forth herein. Further answering, Abbott specifically objects to this request because it is irrelevant, over broad, vague, unduly unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. In addition, the terms “marketing” or “promotion” are vague and undefined. Relevant documents related to the marketing of ritonavir have already been produced.

DOCUMENT REQUEST NO. 47

All documents evidencing, referring, or relating to the sale of Ritonavir before 1996.

RESPONSE: Abbott incorporates its General Objections as if fully set forth herein. Further answering, Abbott specifically objects to this request because it is over broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Abbott also objects to the extent that this request seeks information protected by any applicable privilege, including but not limited to the attorney-client privilege or work product privilege. Finally, Abbott objects to this request because it seeks information that does not relate to any claim or defense at issue in this litigation. Specifically, this request appears to go to the validity of Abbott’s patents, which the Court has indicated is not a proper subject of discovery. Indeed, the Court denied Plaintiffs’ Rule 56(f) request for further discovery relating to “the patents’ validity and enforceability.” (9/12/05 Order at 6). As Judge Wilken explained “Plaintiffs have not identified any facts that they hope to obtain from discovery relating to the Norvir patents’ validity, nor have they alleged in this litigation that Defendants’ patents are invalid.” (*Id.*). Accordingly, this request is improper.

DOCUMENT REQUEST NO. 48

All documents evidencing, referring, or relating to the use of Ritonavir in any mammal before 1996.

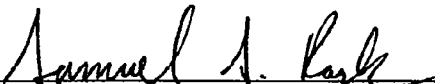
RESPONSE: Abbott incorporates its General Objections as if fully set forth herein. Further answering, Abbott specifically objects to this request because it is over broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Abbott also objects to

1 discovery relating to the Norvir patents' validity, nor have they alleged in this litigation that
2 Defendants' patents are invalid." (*Id.*). Accordingly, this request is improper.
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5 Dated: January 3, 2006

WINSTON & STRAWN LLP

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8 By:



Samuel S. Park

Attorney for Defendant

ABBOTT LABORATORIES
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